

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: :
MOTORS LIQUIDATION COMPANY, et al., : Chapter 11
f/k/a General Motors Corp., et al., : Case No.: 09-50026 (MG)
Debtors. : (Jointly Administered)
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PROPOSED SCHEDULE

I. Motion for Order: (1) Granting Authority to Reallocate and Use Distributable Cash for Notice Procedures; (2) Approving Notice Procedures with Respect to (A) the Proposed Settlement Pursuant to Federal Rule of Bankruptcy Procedure 2002(m) and (B) the Estimation Motion; and (3) Directing the Production of Information Held by General Motors LLC Pursuant to Federal Rule of Bankruptcy Procedure 2004 and Bankruptcy Code Section 105(a) (the “Notice Motion”).

1. Objections to the Notice Motion must be filed with the Court on or before May 25, 2018 at 4:00 p.m. (EST).

2. Replies in further support of the Notice Motion must be filed with the Court on or before June 1, 2018.

3. The hearing on the Notice Motion will take place on June 4, 2018 at 11:00 a.m. (EST).

4. New GM shall provide Recall Data (as defined in the Notice Motion) within 10 days of entry of an Order approving the Notice Motion. [June 14]

5. Noticing begins within 21 days of receipt of the Recall Data. [July 5]

II. Motion to Approve (I) the GUC Trust Administrator’s Actions and (II) the Settlement Agreement By and Among the Signatory Plaintiffs and the GUC Trust Pursuant to Bankruptcy Code Sections 105, 363, and 1142 and Bankruptcy Rules 3002 and 9019 and (III) Authorize the Reallocation of GUC Trust Assets (the “Settlement Motion”).

6. The Signatory Plaintiffs and the GUC Trust (as each are defined in the Settlement Motion) do not believe that discovery is necessary with respect to the Settlement

Motion and propose that no such discovery be permitted. To the extent that the Court concludes that any interested party is entitled to discovery with respect to the Settlement Motion, such discovery will commence upon entry of the Notice Order [June 4] and shall be completed in all respects no later than the deadline for responses to the Settlement Motion [July 29, 2018].

7. Objections to the Settlement and opening briefs in support of the Settlement Motion and addressing New GM's standing to be heard with respect to the Settlement Motion must be filed with the Court no later than 30 days after noticing begins. **[July 29]**.

(a) Simultaneous reply briefs must be filed with the Court no later than 10 days after opening briefs. **[Aug. 8]**

8. The hearing on the Settlement Motion will take place on August 13, 2018.

III. Motion to Estimate Vehicle Recall Economic Loss and Personal Injury Claims for Allowance Purposes and to Establish a Schedule for the Claims Estimation Proceeding (the "Estimation Motion").

9. No fact discovery will take place with respect to the Estimation Motion.

10. Objections to the Estimation Motion and simultaneous opening briefs addressing New GM's standing to be heard with respect to the Estimation Motion must be filed with the Court no later than [September 2, 2018].

11. Those parties permitted to participate shall file and serve opening expert reports regarding the estimated amount of Old GM liability resulting from the Recalls no later than 20 days after entry of an Order approving the Settlement Motion. **[Sept. 2]** The economic loss and personal injury plaintiffs shall each be permitted no more than three (3) damages experts. The same limitations will apply to New GM should the Court determine that New GM is entitled to participate in the proceedings related to this Estimation Motion.

12. Those parties permitted to participate shall file and serve rebuttal reports regarding the estimated amount of Old GM's liability resulting from the Recalls by 20 days after service of opening expert reports. [Sept. 22]

13. Each party permitted to participate shall make its expert available to be deposed, with any such depositions to be completed within 10 days following the deadline to file rebuttal reports. [Oct. 1]

14. Any pre-trial briefs shall be filed no later than 8 days following the deadline to complete depositions of the parties' respective experts. [Oct. 9]

15. The parties permitted to participate shall exchange pre-marked copies of all exhibits offered at the hearing on the estimation of Old GM's aggregate liability resulting from Recalls and provide copies of any such exhibits to the Court by 10 business days prior to the commencement of the estimation hearing. [Oct. 17]

16. The Parties shall submit to the Court a proposed Joint Pretrial Conference Order by seven days prior to the commencement of the estimation hearing. [Oct. 24]

17. The evidentiary hearing on the Estimation Motion will take place in the Court on [October 31, 2018].

Dated: May 18, 2018
New York, New York

Respectfully submitted,

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